

Re: Bledar Gani v. Guardian Service Industries, Inc., et al. 10 Civ. 4433 (CM) (JCF)

Dear Judge McMahon:

This firm represents the defendants in the above-referenced action.

On January 13, 2011, Your Honor issued an Order granting the motion of the plaintiff for approval of a collective action notice (the "Order"). The Order directed the defendants to provide to plaintiff, within 20 days of the date of the Order, the names and addresses of all cleaner employees for the six years preceding the date of the filing of the complaint.

While defendants have compiled a substantial number of names and addresses already, they require additional time to produce a complete list. I have conferred with William C. Rand, the attorney for the plaintiff, who has consented to a 30-day adjournment of the time for defendants to provide a complete list in compliance with the January 13, 2011 Order.

If Your Honor grants this application, the time for defendants to provide the list would be extended from February 2, 2011 until March 4, 2011. The plaintiff would then require a 30-day extension of its time to send out a mailing, from February 25, 2011 until March 23, 2011.

Defendants have consented to the tolling of the statute of limitations during the 30-day extension, if the Court grants it.

## GF GOETZ FITZPATRICK LLP

The Honorable Colleen McMahon United States District Court Southern District of New York February 3, 2011 Page 2

If a 30-day extension of the time periods in the Order is acceptable to Your Honor, we respectfully request that Your Honor "So Order" the extension. Thank you for your attention to this matter.

Very truly yours,

Ellen August

So Ordered:

U.S.D.J.

cc: William C. Rand, Esq. Attorney for Plaintiff (Via e-mial)